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Attorneys for Plaintiffs
Oracle USA, Inc., Oracle America, Inc., and
Oracle International Corp.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;
ORACLE AMERICA, INC., a Delaware
corporation; and ORACLE INTERNATIONAL
CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;
SETH RAVIN, an individual,

Defendants.

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Case No 2:10-cv-0106-LRH-PAL

**SUPPLEMENTAL DECLARATION
OF THOMAS S. HIXSON IN
SUPPORT OF ORACLE'S MOTION
FOR COSTS AND ATTORNEYS'
FEES**

1 I, Thomas S. Hixson, declare as follows:

2 1. I am an attorney admitted to practice law in the State of California and before the
3 Court in this action *pro hac vice*. I am a partner with the law firm Morgan, Lewis and Bockius
4 LLP (“Morgan Lewis”), counsel of record for Plaintiffs Oracle USA, Inc., Oracle America, Inc.,
5 and Oracle International Corporation (together, “Oracle” or “Plaintiffs”), and was previously a
6 partner with the law firm Bingham McCutchen LLP (“Bingham”), which was also counsel of
7 record for Oracle. I submit this supplemental declaration in support of Oracle’s motion for
8 attorneys’ fees and costs in the above-captioned lawsuit. The facts stated herein are based on my
9 personal knowledge or on information provided to me by attorneys working under my direction.

10 2. Amended Exhibit 1 is a summary and breakdown of the total amount of Oracle’s
11 fees and costs incurred in this case, including those paid to Bingham; Morgan Lewis; Boies,
12 Schiller and Flexner LLP (“Boies Schiller”); and to other firms and companies.

13 3. Amended Exhibit 1 reflects changes to (1) the total Bingham and Morgan Lewis
14 attorneys’ fees claimed in Exhibit 2, (2) the total Boies Schiller attorneys’ fees claimed in
15 Exhibit 2 to the Ringgenberg Decl., (3) the total expert fees claimed for Dr. Randall Davis, (4)
16 the total expert fees claimed for TM Financial Forensics, and (5) the total consulting fees
17 claimed for JRI. Italicized text on Amended Exhibit 1 indicates that the amount has been
18 modified from the amount in the original Exhibit 1.

19 4. Amended Exhibit 1 has been corrected to include \$61,934.16 in fees paid to JRI
20 for consulting services. The total amount paid to JRI as stated in paragraph 103 of my
21 November 13 declaration is correct. The invoices reflecting those charges were attached as
22 Exhibit 15 to my November 13 declaration.

23 5. Amended Exhibit 1 has been corrected to exclude \$48,400 in expert fees paid to
24 Dr. Randall Davis. That amount was mistakenly included in the original Exhibit 1 total. The
25 invoices attached as Exhibit 19 to my November 13 declaration excluded those charges. The
26 amount that Oracle seeks to recover for Dr. Davis’s services on this case is \$465,752.61, not
27 \$514,152.61 as mistakenly stated in paragraph 107 of my November 13 declaration.

28 6. Amended Exhibit 1 has been corrected to include \$120,229.88 in expert fees paid

1 to TM Financial Forensics for consulting services. That amount was mistakenly omitted in the
2 original Exhibit 1 total. The invoices reflecting those charges were attached as Exhibit 17 to my
3 November 13 declaration. Paragraph 105 of my original declaration mistakenly stated that
4 Oracle paid TM Financial Forensics a total of \$1,812,066.02 for its services on this case. The
5 correct amount that Oracle paid TM Financial Forensics for its services and for which Oracle
6 seeks recovery is \$1,932,295.90.

7 7. Amended Exhibit 2 reflects a reduction of \$15,767 from the total Bingham and
8 Morgan Lewis attorneys' fees claimed. This amount was inadvertently included in the attorneys'
9 fees listed on the original Exhibit 2, though it comprises fees billed for work that has been
10 redacted from the Bingham and Morgan Lewis invoices in Exhibits 3-9 to the Hixson Decl.
11 Italicized text on Amended Exhibit 2 indicates that the amount has been modified from the
12 amount in the original Exhibit 2.

13 8. As detailed in Amended Exhibit 2, the attorneys and legal support staff at
14 Bingham and Morgan Lewis have billed 40,617 hours for unredacted work on this case.
15 Paragraph five of my original declaration mistakenly stated an amount of 40,642 hours for
16 unredacted work on this case.

17 9. Paragraph 104 of my original declaration mistakenly stated that Oracle paid
18 AACG a total of \$554,004.88 for its services on this case. The correct amount that Oracle paid
19 AACG for its services is \$622,105.83.

20 10. Attached as Exhibit A are true and correct copies of three invoices for AACG's
21 work, dated 12/21/2011, 2/17/2012, and 3/19/2012. Copies of these invoices were inadvertently
22 omitted from Ex. 16 to my original declaration.

11. Attached as Exhibit B is a true and correct copy of a corrected version of page 24 from the October 14, 2014 invoice, included in Exhibit 8 to my November 13 declaration. The corrected version removes a redaction that was inadvertently applied to the original exhibit.

I declare that the foregoing is true under penalty of perjury under the laws of the United States.

Executed November 30, 2015 in San Francisco, California.

/s/ Thomas S. Hixson
Thomas S. Hixson